



JAMES E. JOHNSON  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

William G. Rives  
Senior Counsel  
Assistant Corporation Counsel  
Cell: (646) 581-8031

February 8, 2021

**VIA ECF**

Hon. Vernon S. Broderick  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, New York 10007

**APPLICATION GRANTED**

**SO ORDERED** *W. Broderick*

**VERNON S. BRODERICK**

**U.S.D.J. 2/9/2021**

Re: Third Request

R.A. and B.A. on behalf of A.A . v. New York City Department of  
Education. 20-CV-4275 (VSB) (SN)

Dear Judge Broderick:

I am an Assistant Corporation Counsel in the office of Corporation Counsel James E. Johnson, attorney for Defendant in the above-referenced action wherein Plaintiff seeks attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request a further extension of the parties' time to submit a joint letter in lieu of a court conference pursuant to your order dated November 3, 2020. I request the time to file be extended two weeks, from February 9, 2021 to February 23, 2021. This is the third request for an extension of the deadline. The first adjournment was from December 15, 2020 to January 18, 2021. The second extension was from January 18, 2021 to February 9, 2021. Plaintiff consents to the request. I was recently assigned this case and have requested settlement authority from the Comptroller of the City of New York, as required pursuant to New York City Charter §93(i). I anticipate being able to enter settlement negotiations this month with an eye toward settling this matter without further burden on the court. Accordingly, Defendant respectfully requests the time to submit a joint letter be extended to February 23, 2021.

Thank you for considering this request.

Respectfully submitted,

/s/

William G. Rives

Assistant Corporation Counsel

cc: Adam Dayan, Esquire  
(Via ECF)